

**REMARKS**

Claims 1-37 are pending in the present application and claims 1-37 stand rejected. By virtue of this response, claims 1, 2, 19, 20, and 37 have been amended, no claims have been canceled, and no new claims have been added. The amendment is fully supported by the claims and specification as-filed, e.g., see at least paragraphs [0024]-[0044] of the present application as published, and no new matter has been added. Accordingly, claims 1-37 are currently under consideration. Amendment and cancellation of certain claims are not to be construed as a dedication to the public of any of the subject matter of the claims as previously presented.

For the Examiner's convenience, Applicants' remarks are presented in the same order in which they were raised in the Office Action.

**Claim Rejections under 35 U.S.C. §102**

Claims 1, 2, 13-15, 19, 20, 31-33, and 37 stand rejected under 102(b) as allegedly being anticipated by Tuzhilin (U.S. Patent Number 6,236,978).

Applicants have amended claim 1 (and similarly claims 19 and 37) to recite that each of the user events is at least in part defined by one or more user parameters, and wherein the event parameters are automatically updated. The amendment is fully supported by the claims and specification as-filed, e.g., see at least claim 2 and paragraphs [0024]-[0044] of the present application as published, and no new matter has been added.

Applicants respectfully submit that Tuzhilin at least fails to disclose or suggest collecting, analyzing, and correlating user events of a first and a second user across a plurality of domains in a database, wherein each of the user events is at least in part defined by one or more user event parameters, and wherein the event parameters are automatically updated, as recited by amended claim 1 (and similarly by claims 19 and 37).

As support for the above features of amended claim, paragraph [0022] of the present application as published (emphasis added) discloses, e.g., the following:

A domain is a computer system implemented with different hardware and software for a specific application, such as the shopping application 106, news application 108, and movie application 110. Users' interactions with each particular domain, also referred to as user events, are saved and updated in the user database 114. The user database 114 comprises storage for data collected from each individual domain, for example movies data 116, news data 118, shopping data 120 and other domain data 122.

The present application further discloses that storing, collecting, and correlating user events from multiple domains (e.g., shopping, movies, news, and so on) are more complex than from just a single domain because the data format from each domain may be different and the domains are managed by diverse teams of people in different geographical locations. (See paragraphs [0025] and [0031] of the application as published). The recommendation system may handle different types of events from different domains and a variety of event values for a given event. (See paragraphs [0026]-[0030]). Moreover, any ongoing changes in the recommendation system are automatically updated. For example, for the domain "Personals" and the event type "Method of Contact," the known values might be email, voicemail, or pager. As the Personals product changes, a new method of contacting people, such as "webcam," may be added. (See paragraph [0041]). The system handles this change dynamically. In other words, the set of domains, services, users, and attributes of the user events may change constantly, and changes in all domains are adapted to and accommodated by the centralized user database. (See paragraphs [0031]-[0032]).

The Examiner cites to col. 3, line 58 to col. 4, line 29 for disclosing user events that include one or more user event parameters. (See page 3, line 6 of Office Action). However, Tuzhilin fails to disclose or suggest collecting, analyzing, and correlating user events, wherein the event parameters defining the user events may be automatically updated. In contrast, Tuzhilin discloses that "a human expert must decide which dynamic rules should be stored and which dynamic rules should be discarded." (See col. 4, lines 48-50). Tuzhilin further discloses that after aggregated rules are formed, "the aggregated rules are evaluated by a human expert who selects only the rules that the expert believes are pertinent for the user." (See col. 4, lines 62-64).

Accordingly, for at least these reasons, Tuzhilin fails to disclose or suggest all the features of claims 1, 19, and 37 and the rejection should be withdrawn. Additionally, all claims depending therefrom are allowable over Tuzhilin for at least the same reasons.

**Claim Rejections under 35 U.S.C. §103**

Claims 3-12, 16-18, 21-30, and 34-36 stand rejected under U.S.C. 103(a) as allegedly being unpatentable over Tuzhilin in view of Smith et al. (U.S. Publication Number 2002/0010625).

Claims 3-12, 16-18, 21-30, and 34-36 depend from claims 1, 19, and 37 respectively and are allowable over Tuzhilin for at least the same reasons as claims 1, 19, and 37 discussed above. The addition of Smith fails to cure the deficiencies of Tuzhilin. Accordingly, the rejection should be withdrawn.

**CONCLUSION**

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to withdraw the outstanding rejection of the claims and to pass this application to issue. If it is determined that a telephone conference would expedite the prosecution of this application, the Examiner is invited to telephone the undersigned at the number given below.

In the event the U.S. Patent and Trademark office determines that an extension and/or other relief is required, applicant petitions for any required relief including extensions of time and authorizes the Commissioner to charge the cost of such petitions and/or other fees due in connection with the filing of this document to Deposit Account No. 03-1952 referencing docket no. 324212000500. However, the Commissioner is not authorized to charge the cost of the issue fee to the Deposit Account.

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Respectfully submitted,

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